

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DISTRICT

UNITED STATES OF AMERICA,)
)
) Plaintiff,)
)
v.) No. 4:14CR00187 JAR (DDN)
)
PAMELA TABATT, and)
RICHARD GROSS)
)
) Defendant.)

**GOVERNMENT’S MOTION FOR ADDITIONAL TIME TO FILE RESPONSE TO
DEFENDANTS’ MOTIONS TO DISMISS AND
MOTION FOR BILL OF PARTICULARS**

Comes now the United States of America, by and through its attorneys, Richard G. Callahan, United States Attorney for the Eastern District of Missouri, and James C. Delworth, Jennifer Winfield, and Erin Granger, Assistant United States Attorneys for said District, and for its Motion for Additional Time to File Responses to Defendants’ Motions to Dismiss (Doc. Nos. 148, 149, and 151) and Defendants’ Motion for Bill of Particulars (Doc. No. 147) states as follows:

1. Defendants are charged with *inter alia*, conspiracy to distribute and to possess with the intent to distribute Schedule I controlled substances and Schedule I controlled substance analogues intended for human consumption and conspiracy to introduce misbranded drugs into interstate commerce.
2. On October 8, 2015, Defendants filed three separate motions to dismiss the indictment and one motion for a bill of particulars.
3. Due to the number of issues and volume of material involved in this motion response as well as the undersigned’s current workload, the Government requests additional

time in which to respond.

WHEREFORE, Counsel for the Government respectfully request this Honorable Court to grant the government a one-week extension of time, up to and including **November 16, 2015**, in which to file responses to Defendants' motions.

Respectfully submitted,

RICHARD G. CALLAHAN
United States Attorney

s/ Erin Granger
ERIN GRANGER, #53593MO
Assistant United States Attorney
111 South 10th Street, Room 20.333
St. Louis, MO 63102
(314) 539-2200

CERTIFICATE OF SERVICE

I hereby certify that on November 9, 2015, the foregoing was filed electronically with the Clerk of the Court to be served by operation of the Court's electronic filing system upon all counsel of record.

s/ Erin Granger
ERIN GRANGER, #53593MO
Assistant United States Attorney